

[Names and Addresses of Counsel
Appear on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DERRICK SATCHELL, KALINI
BOYKIN, VALERIE BROWN, RICK
GONZALES, CYNTHIA GUERRERO,
RACHEL HUTCHINS, TYRONE
MERRITT, KELVIN SMITH, SR., and
KEN STEVENSON, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

FEDEX EXPRESS, a Delaware
corporation,

Defendant.

Case No. C 03-2659 SI

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER RE SCHEDULE FOR
ADDITIONAL REPORTS, REBUTTAL
REPORTS AND DEPOSITIONS OF
DRS. BAKER AND DROGIN AND
ADDITIONAL DEPOSITION DATES FOR
DRS. GREENWALD, ZEDECK, BIELBY,
AND CAMPION**

CALDWELL, et al.,

Plaintiffs,

vs.

FEDEX CORPORATION, et al.,

Defendants.

Case No. C 03-02878 SI

1 The parties, through their counsel, hereby stipulate and agree as follows:

2 1. On or before November 10, 2006 FedEx shall produce complete personnel
3 and payroll data for the period January 1, 2006 through September 30, 2006.

4 2. On December 20, 2006 the parties shall exchange, in electronic form,
5 additional statistical reports from Drs. Baker and Drogin. Dr. Drogin's report shall contain only
6 the analyses from his June 30, 2006 and September 8, 2006 reports, and the revised analyses
7 Dr. Drogin produced at the outset of his deposition on September 19, 2006, supplemented by the
8 data covering the period January 1, 2006 to September 30, 2006. Dr. Baker's report may only
9 contain (a) additional promotional analyses focused on any promotion claims covered by the
10 Court's September 19, 2006 Order regarding the promotion claims certified on behalf of the
11 hourly Minority Class, and (b) analyses from her June 30, and September 8 reports supplemented
12 by data covering the period January 1, 2006 to September 30, 2006.

13 3. By December 27, 2006 the parties shall produce to each other, in electronic
14 form, documents and data relating to the Baker and Drogin December 20 Reports.

15 4. By January 10, 2007, the parties shall exchange, in electronic form, rebuttal
16 reports of Drs. Drogin and Baker.

17 5. The parties shall complete the depositions of Drs. Baker and Drogin by
18 January 19, 2007.

19 6. Defendant shall complete the deposition of Dr. Zedeck on October 25,
20 2006.

21 7. Defendant shall complete the deposition of Dr. Greenwald on October 27,
22 2006.

23 8. Plaintiff shall complete the deposition of Dr. Campion on November 9
24 and 10, 2006.

25 9. Defendant shall complete the deposition of Dr. Bielby on November 13,
26 2006.

27 SO STIPULATED.
28

1 Dated: October 24, 2006

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

2
3 By: 

James M. Finberg

4 Bill Lann Lee
5 Eve H. Cervantez
6 Daniel E. Barenbaum
7 Chimène I. Keitner
8 275 Battery Street, 30th Floor
9 San Francisco, CA 94111-3339
10 Telephone: (415) 956-1000
11 Facsimile: (415) 956-1008

12 Todd M. Schneider (SBN 158253)
13 Guy B. Wallace (SBN 176151)
14 Joshua Konecky (SBN 182897)
15 SCHNEIDER & WALLACE
16 180 Montgomery Street, Suite 2000
17 San Francisco, CA 94104
18 Telephone: (415) 421-7100
19 Facsimile: (415) 421-7105

20 JOHN BURRIS (SBN 69888)
21 7677 Oakport Bldg., Suite 1120
22 Oakland, CA 94612
23 Telephone: (510) 839-5210
24 Facsimile: (510) 839-3882

25 MICHAEL S. DAVIS (SBN 160045)
26 345 Hill Street
27 San Francisco, CA 94109
28 Telephone: (415) 282-4315
Facsimile: (415) 358-5576

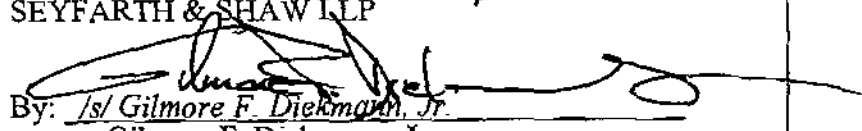
KAY MCKENZIE PARKER (SBN 143140)
225 Bush Street, 16th Floor
San Francisco, CA 94104
Telephone: (415) 227-9622
Facsimile: (415) 227-4522

WAUKEEN Q. MCCOY (SBN 168228)
703 Market Street, Suite 1407
San Francisco, CA 94103
Telephone: (415) 675-7705
Facsimile: (415) 675-2530

Class Counsel

1 Dated: October 24, 2006

SEYFARTH & SHAW LLP

2
3 By:  Gilmore F. Diekmann, Jr.
Gilmore F. Diekmann, Jr.

4 SEYFARTH & SHAW LLP
5 560 Mission Street, Suite 3100
6 San Francisco, CA 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

7 FEDERAL EXPRESS CORP.
8 3620 Hacks Cross Road, Bldg. B, 3rd fl.
Memphis, TN 38125-8800
9 Telephone: (901) 434-8519
Facsimile: (901) 434-9271

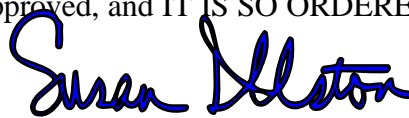
10 Evelyn Becker
11 O'MELVENY & MYERS LLP
12 1625 Eye Street, N.W.
Washington, D.C. 20006-4001
13 Telephone: (202) 383-5300
Facsimile: (202) 383-5414

14 *Counsel for Defendant*

ORDER

The foregoing stipulation is approved, and IT IS SO ORDERED.

Dated: _____



Hon. Susan Illston
United States District Judge

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